

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

No. 04-10644-MEL

**LINDA MELLEN,
Plaintiff,**

v.

**TRUSTEES OF BOSTON
UNIVERSITY and FRANCES
A. DROLETTE,
Defendants.**

**PLAINTIFF'S FURTHER MOTION TO COMPEL DEFENDANT'S
PRODUCTION OF UNREDACTED DOCUMENTS, FOR LEAVE TO CONDUCT
FURTHER DISCOVERY REGARDING SUCH DOCUMENTS, AND FOR THE
AWARD OF COSTS**

By Order dated October 19, 2005, upon plaintiff's Motion, the Court directed the defendant University to produce certain documents. Six weeks later, on December 1, 2005, the University produced documents from which it unilaterally removed critical information that identified the former University employees at issue. As a consequence, this Further Motion is filed to compel the University's production of unredacted documents.

At the same time, plaintiff requests the Court's leave to conduct discovery for 45 days regarding the unredacted documents, following defendant's production of the unredacted documents.¹

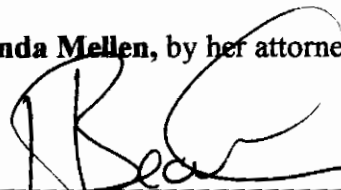
Lastly, plaintiff requests in accordance with Fed.R.Civ.P., R. 37(a)(4)(A), an award of plaintiff's reasonable expenses, including attorney's fees, associated with this

¹ This matter is not presently subject to a trial date.

Motion, in light of the defendant University's unilateral redaction of the subject documents.

For these reasons, and as more fully set forth in the accompanying Memorandum, plaintiff requests the Court's further Order.

Linda Mellen, by her attorney,



Harry C. Beach BBO#547893
Law Offices of Harry C. Beach
30 Walpole Street
Norwood, MA 02062
Office: 781.255.5573
Cell: 617.968.4531
HBeach@HarryBeach.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on Feb. 15, 2006

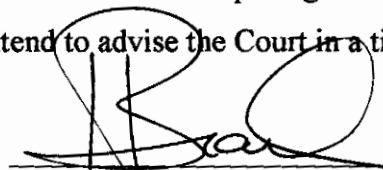
Signed: 

February 15, 2006

LOCAL RULE 37.1 CERTIFICATION OF COUNSEL

I, Harry C. Beach, counsel of record for the plaintiff Linda Mellen, in accordance with Local Rule 37.1, certify to the following:

I have conferred with defendants' counsel, Crystal D. Talley, with respect to defendants' redaction of the documents that the Court in October 2005 ordered defendants to produce. We have conferred over the course of several months by phone, by email, and by letters. Despite these efforts, defendants continue to resist disclosure of the compelled documents in unredacted form. Today I made further attempts to resolve our differences on this issue by proposing to University counsel, by letter, that the parties enter stipulations regarding confidentiality and the related re-opening of discovery. See Tab 7 hereto. If this effort is successful, I intend to advise the Court in a timely manner.



Harry C. Beach BBO#547893

February 15, 2006